

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

\_\_\_\_\_  
FREEDOM MORTGAGE CORPORATION  
*Debt Buyer and/or Debt Collector*  
*Movant*

**Response to Movant's Motion for Relief**

vs.

Case Number: 5:25-BK-00501-MJC  
Case Filed: February 27, 2025

Hericson Torres  
*Record Owner*  
*Respondent*

**RESPONDENT'S RESPONSE TO MOVANT'S MOTION FOR RELIEF**

AND NOW, this 25th day of March, 2025, here comes Respondent's, Hericson Torres, *in propria persona*, to file this Response to Movant's Motion for Relief and, in support thereof, aver as follows:

1. Neither admitted nor denied that Freedom Mortgage Corporation is the Movant. KML Law Group, P.C. has not provided any proof or evidence that it was hired by or authorized to represent Freedom Mortgage Corporation.
2. Admitted in part. Admitted that so-called "Debtor" is owner of the private property located at 325 Five Spring Road, Stroudsburg, PA 18360. Denied that 325 Five Springs Road, Stroudsburg, PA 18360 is mortgaged premises.
3. Admitted.
4. Denied. Denied that Movant is "holder." Freedom Mortgage Corporation is not the "holder" and is not a "real party in interest." Freedom Mortgage Corporation has not shown possession of a note endorsed to it or endorsed in blank or containing language stating that it is bearer paper. The alleged Mortgage "assignment" is defective. The entity that "assigned" the Mortgage did not own the Mortgage at the time of the defective assignment. The "assignment" was not properly notarized and was completed using a "robo-signer." Movant, Freedom Mortgage Corporation, in this case, is not a creditor. As per 15 U.S.C. § 1692a(4): A creditor is "any person who offers or extends credit creating a debt or to whom a debt is owed, but such term does not include a person to the extent that he receives an assignment or transfer of the debt in "defaults" solely for the purpose

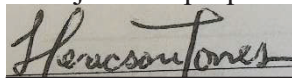
of facilitating collection of such a debt for another." Movant, Freedom Mortgage Corporation, admitted that (1) "On January 15, 2020, the aforesaid mortgage was again declared in default and the firm of KML Law Group, P.C., was retained to institute a foreclosure action on behalf of the Secured Creditor" and (2) "The Mortgage has been assigned as follows: Assigned to Freedom Mortgage Corporation on August 3, 2022, recorded in Monroe County on August 4, 2022, Book 2615, Page 1409."

5. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph five and strict proof thereof is demanded. *QUESTION: Who was the "Secured Creditor?"*
6. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph six and strict proof thereof is demanded. *QUESTION: Who was the "Secured Creditor?"*
7. Admitted in part. Denied that a foreclosure action was started with on April 28, 2023.
8. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eight and strict proof thereof is demanded
9. Admitted.
10. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph ten and strict proof thereof is demanded.
11. Admitted that the Bankruptcy was dismissed. Denied that the Bankruptcy was dismissed on September 6, 2024. Respondent was dealing with urgent medical matters. Respondent notified all parties regarding the medical emergency.
12. Admitted.
13. Admitted in part. The documents that were required to be filed at the time of this Bankruptcy filing were filed on February 27, 2025. The remainder of the documents were not due at the time Movant filed its Motion for Relief on March 11, 2025.
14. Admitted in part. As of March 24, 2025, a Sheriff's Sale is scheduled for April 27, 2025.
15. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph fifteen and strict proof thereof is demanded.

16. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph sixteen and strict proof thereof is demanded.
17. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph seventeen and strict proof thereof is demanded.
18. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eighteen and strict proof thereof is demanded.
19. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph nineteen and strict proof thereof is demanded.
20. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph twenty and strict proof thereof is demanded. Furthermore, Movant is not entitled to relief from stay "for cause." Movant is not injured.
21. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph twenty one and strict proof thereof is demanded. Furthermore, Respondent refuses to cover the costs affiliated with the FRAUD caused by Freedom Mortgage Corporation and KML Law Group, P.C. Respondent's complain that KML Law Group, P.C. does not have a written agreement with the so-called Movant, Freedom Mortgage Corporation.

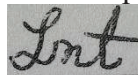
WHEREFORE, the Respondent's, Hericson Torres and Leigh Torres, *in propria persona*, respectfully requests that this Court deny Movant's Motion for Relief. The Respondent's further requests any other relief that the Court deems just and proper.

Date: March 25, 2025



Respondent, Hericson Torres, *in propria persona*  
325 Five Springs Road, Stroudsburg, PA 18360

Date: March 25, 2025



Respondent, Leigh Torres, *in propria persona*  
325 Five Springs Road, Stroudsburg, PA 18360

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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FREEDOM MORTGAGE CORPORATION  
*Debt Buyer and/or Debt Collector*  
*Movant*

**ORDER**

vs.

Case Number: 5:25-BK-00501-MJC  
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Hericson Torres  
*Record Owner*  
*Respondent*

\_\_\_\_\_  
X

**ORDER**

**AND NOW**, this \_\_\_\_ day of \_\_\_\_\_, 2025 upon consideration of Respondent's Response to  
Movant's Motion for Relief thereto, it is hereby:

**ORDERED AND DECREED:** that Movant's Motion for Relief is denied.

**ORDERED AND DECREED:** that Respondent's prayer for relief is confirmed.

BY THE COURT:

\_\_\_\_\_  
J.

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

\_\_\_\_\_  
FREEDOM MORTGAGE CORPORATION  
*Debt Buyer and/or Debt Collector*  
*Movant*

**VERIFICATION**

vs.

Case Number: 5:25-BK-00501-MJC  
Case Filed: February 27, 2025

Hericson Torres  
*Record Owner*  
*Respondent*

\_\_\_\_\_  
X

**VERIFICATION**

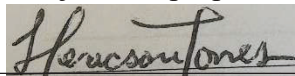
Respondent's, Hericson Torres and Leigh Torres, *in propria persona*, being duly sworn deposes and says; That he and she have read the foregoing documents and know the contents thereof; That the same is true to his and her knowledge, except as to those matters therein stated to be alleged upon information and belief, and that as to those matters, he and she believe them to be true.

Respondent's, Hericson Torres and Leigh Torres, *in propria persona*, hereby verify that the facts set forth in the foregoing documents are true and correct to the best of his and her knowledge, information and belief.

Respondent's, Hericson Torres and Leigh Torres, *in propria persona*, understand that false statements made herein are subject to the penalties of 18 Pa C.S.A. § 4904, relating to unsworn falsification to authorities.

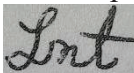
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FREEDOM MORTGAGE CORPORATION  
*Debt Buyer and/or Debt Collector*  
*Movant*

**CERTIFICATION OF SERVICE**

vs.

Case Number: 5:25-BK-00501-MJC  
Case Filed: February 27, 2025

Hericson Torres  
*Record Owner*  
*Respondent*

\_\_\_\_\_  
X

**CERTIFICATION OF SERVICE**

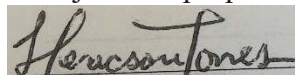
Respondent's, Hericson Torres and Leigh Torres, *in propria persona*, hereby certify that a true and correct copy of the documents in this filing were sent by e-mail to the following parties:

Distribution List

cc: Jill E. Durkin, Trustee at jilldurkinesq@gmail.com  
cc: United States Trustee at ustpreregion03.ha.ecf@usdoj.gov  
cc: Brent J. Lemon, Esq. at blemon@kmlawgroup.com

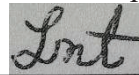
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Respondent, Leigh Torres, *in propria persona*  
325 Five Springs Road, Stroudsburg, PA 18360

RESPONDENT'S CAN BE CONTACTED VIA EMAIL AT HERICSON888@GMAIL.COM  
OR BY CALL, TEXT OR VOICEMAIL AT 347-566-4877.